

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

In Re:)
RALPH ELLIOT THOMPSON)
)
) Case No. 15-02383-JMC-13
)
Debtor)

**MOTION TO MODIFY CHAPTER 13 PLAN
AND NOTICE OF OBJECTION DEADLINE**

Comes now the Debtor, by counsel, and moves the Court for an order modifying his plan, post-confirmation. In support of his motion, Debtor states as follows:

- 1) Debtor filed this Chapter 13 case on March 25, 2015.
- 2) The current plan was confirmed on July 1, 2015.
- 3) Debtor no longer wishes to retain the Kirby Cleaning System financed through United Consumer Financial Services.
- 4) Debtor proposes that his plan be modified as follows:

Debtor intends to surrender, and upon approval of this motion, the Chapter 13 estate abandons any interest in the following collateral:

Creditor	Collateral Surrendered/Abandoned	Scheduled Value of Property
United Consumer Financial Services (UCFS Kirby Cleaning System)	Kirby Cleaning System	n/a

All other terms of the plan shall remain unchanged.

NOTICE IS GIVEN that any objection must be filed with the Bankruptcy Clerk within **21 days** from date of service [or such other time period as may be permitted by Fed.R.Bankr.P. 9006(f)]. Those not required or not permitted to file electronically must deliver any objection by U.S. mail, courier, overnight/express mail, or in person at:

Indianapolis
116 U.S. Courthouse
46 E. Ohio St.
Indianapolis, IN 46204

The objecting party must ensure delivery of the objection to the party filing the motion, (the trustee – if not the movant or the objector) (and the debtor – if not the movant or the objector). **If an objection is NOT timely filed, the requested relief may be granted.**

WHEREFORE, Debtor prays that the Court grant the motion to modify the plan as proposed and grant such other relief as appropriate.

Respectfully Submitted,

/s/ Dana L. Oglesby

Dana L. Oglesby, 27988-82

Counsel for Debtor(s)

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CERTIFICATE OF SERVICE

I hereby certify that on September 1, 2015, a copy of the foregoing MOTION TO MODIFY PLAN POST-CONFIRMATION was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System. Parties may access this filing through the Court's system.

John M. Hauber
Standing Chapter 13 Trustee
Email: ecfmail@hauber13.com, ecfmail1@hauber13.com

U.S. TRUSTEE
Email: ustpreion10.in.ecf@usdoj.gov

I further certify that on September 1, 2015, a copy of the foregoing MOTION TO MODIFY PLAN POST-CONFIRMATION was mailed by first-class U.S. Mail, postage prepaid, and properly addressed to the following:

United Consumer Financial Services
c/o Bass & Associates, P.C.
3936 E. Ft. Lowell Suite 200
Tucson, AZ 85712

Debtors

/s/ Dana L. Oglesby
Dana L. Oglesby, 27988-82